

**From:** [spill12](#)  
**To:** [Adams, Adam](#)  
**Subject:** FW: 2nd 80s Fire Decon Plan - 4/10/19 updated version (TCEQ Review Input No. 2)  
**Date:** Thursday, April 11, 2019 12:02:39 PM  
**Attachments:** [2nd 80s Fire Equipment Decon Plan 04.10.2019 with attachments.pdf](#)

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Adam,  
Please see Nicole's comments on the Equipment Decon Plan and provide your feedback.  
Thank you,  
Anallely Salinas  
TCEQ- State on Scene Coordinator  
(512)965-2717

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**From:** Nicole Bealle  
**Sent:** Thursday, April 11, 2019 11:52 AM  
**To:** spill12 <spill12@tceq.texas.gov>  
**Cc:** Andy Goodridge <Andy.Goodridge@tceq.texas.gov>; Jason Ybarra <Jason.Ybarra@tceq.texas.gov>; Bob Patton <bob.patton@tceq.texas.gov>; Kelly Cook <kelly.cook@tceq.texas.gov>; Alma Jefferson <Alma.Jefferson@tceq.texas.gov>; Guadalupe Quiroz <guadalupe.quiroz@tceq.texas.gov>

**Subject:** RE: 2nd 80s Fire Decon Plan - 4/10/19 updated version (TCEQ Review Input No. 2)  
State OSC:

Please coordinate with the FOSC regarding the comments to be provided to ITC and let us know if there are questions.

Review of the updated *Fire Equipment Decon plan* included the following:

Remove the term 'product'. As noted in the SCAT plan review comments and other plans reviewed and commented on to date, the plan is using the word "product" to describe liquid incident materials, and consistency is needed in referencing these materials throughout the plans. Please review all plans to ensure the word "oil" is not used solely to describe the material being addressed with this response. At a minimum, plans and documents should be referencing it as "material", "recovered material", "chemical mixture" or "waste".

As previously requested in this plan and other plans, do not refer to the released mixture as 'product'.

General:

- The plan references an approved 'Waste Management Plan' in various locations. Note that a 'Waste Management Plan' has not yet been approved.
- In various locations, the plan refers to a "mutually agreed condition of cleanliness". Please revise the plan define the minimum standard of cleanliness. At a minimum, all waste and waste residues must be removed.
- The title indicates that this plan covers both decontamination and demobilization. Demobilization discussions appear to be limited to transport of assets and equipment from the ops area to the decon area, and company retrieval of decontaminated assets and equipment. Clarify whether there is a separate plan that addresses demobilization activities in more detail.

Section 4.0

- Where is the 'condition of cleanliness' defined or identified? Consider appending the referenced company-specific barge decon procedures to this plan.

## Section 6

- Revise the plan to address protection of the Houston Ship Channel and environs when transporting items for decontamination from one side of the Ship Channel to the other. Booms and other long objects cannot be allowed to drip contamination into the waters.
- A bullet in this section references “Recovered Product”. Revise the plan to clarify that decon waste is to be managed as waste.

## Section 7

- The first sentence states that “In accordance with the approved Demobilization Plan...” This appears to be a circular reference. The title of this plan indicates that it covers both decontamination and demobilization.

### Section 7.2

- The two phases are not clear. There are 4 bullets, should these be grouped to reflect the two specific phases referenced?
- Is the decontamination pool sloped to facilitate collection of decontamination liquids? There is a statement that accumulated liquids will be pumped into vac trucks. Will this be a direct vacuum using the vac truck hoses?
- In the paragraph that indicates that an approved bio-degradable cleaning solution has not yet been identified – has there been any submittal of a cleaning material(s)? If not, when is it anticipated to be provided? Note that no decontamination described is to commence until there is approval by Unified Command (UC).

## Section 9

- Section headings skipped Section 8. Please clarify whether this is a simple typo or indicates missing content.
- “Mechanical recovery equipment may require a breakdown...” Revise the plan to address this in more detail. Include procedures for equipment breakdown, minimum qualifications of technician performing this task, references to necessary reference technical documents/literature to minimize the likelihood of equipment damage during this process.
- Revise the plan to clarify the location of the boom collection site(s) and what procedures will be used to prevent/minimize/eliminate contamination at those locations.
- During the removal of the boom from the transport vessel, what steps are being taken to address any drips/releases that may occur while in transport, from the booms as they are removed from the vessels?
- This section notes that all boom will be returned to the owner. Does this include the boom identified as “damaged beyond repair?”
- The boom identified as “damaged beyond repair” will, according to the plan, be segregated. Please identify the method of segregation and containment as well as the management of the waste for classification and disposal.

## Section 10

- Revise the plan to identify the specific public boat ramps in use.
- Revise the plan to provide additional detail about vessel staging operations.
- Reference Section 11 for details on generated decon water
- Will any waiting vessels be boomed and monitored for sheen? For any vessel that is

not removed from the water for cleaning, what is the booming/capture protocol and/or clarify whether all vessels will be removed from the water for decontamination.

#### Section 14

- This activity involves working with hazardous waste. Revise this section to address pertinent OSHA and RCRA requirements for training.

#### Section 15

- Confined space entry may require supplied air under certain conditions. To minimize confusion, consider revising the plan to remove the reference to level C PPE for this activity, and reference the Health and Site Safety Plan instead.

#### Section 16

- Revise the plan to define the minimum standard of cleanliness. Any contamination by Hazardous Waste will require remediation action/spill response except for *de minimis* incidents (using RCRA definition of *de minimis*).

### **Decon Site Sampling Plan**

#### General

- Revise the plan to address how sampling data will be used to establish baseline conditions, determine whether the site was impacted by decon activities, and whether cleanup is complete.
- Revise the plan throughout to reference and conform to the requirements of the TCEQ QAPP and SW-846. Procedures for hazardous waste sampling, and handling of samples, must comply with the TCEQ Quality Assurance Project Plan (QAPP) for purposes of Quality Control/Quality Assurance (QA/QC). The Sampling Plan (or Waste Handling and Management Plan) should explicitly reference SW-846—Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods. See SW-846 Chapters 1, 2, 9, and 11 for descriptions of accepted sampling methods, plans, QA/QC and relevant procedures. With prior approval through UC, ASTM methods may be substituted in waste characterization and sampling, or in cases where the ASTM method is specified in regulations.
- Title 30 of the Texas Administrative Code Section 25.1 states that the Commission may accept environmental testing laboratory data and analyses for use in Commission decisions regarding any matter under the Commission's jurisdiction relating to permits or other authorizations, compliance matters, enforcement actions, or corrective actions only if the data and analyses are prepared by an environmental testing laboratory accredited by the Commission under this chapter, except as provided in §25.6 of this title (relating to Conditions Under Which the Commission May Accept Analytical Data). Revise the plan to reflect this requirement.

#### Section 3

- Revise this section throughout to address required field QA/QC samples in types and frequencies specified in the TCEQ QAPP and SW-846. Address the analytes to be tested, test methods, sample volume and containers, preservation methods, and sample holding times.
- The discussion on surface water sampling indicates that only one sample will be taken from shore. Revise the plan to clarify how the sample location will be chosen and discuss why that location will be sufficiently representative of surface water

conditions to both establish a baseline condition and to evaluate whether decon operations impacted the surface water.

- Revise the plan to clarify whether samplers will collect one 1 oz grab sample every 100 sq feet, or one 4 oz sample every 400 sq ft.
- Composite sampling for volatile constituents is inappropriate, as it risks volatile loss. Loss of volatiles during the sampling procedure will bias sample results low, and yield results that are not representative of site conditions. Revise the plan to use grab sampling.
- In the discussion on soil sampling, please revise the plan to address how sampling will be conducted for areas that are paved or covered in gravel.
- Revise the plan to add the shipping address and phone number for lab in Kelso, WA.

#### Section 3.D.1

- Revise the plan to include TPH and any other constituents identified in the waste material sampled elsewhere.
- Table 3.D.3-1 – Preservation should be less than or equal to 4 degrees C.

#### Section 5

- Revise this section to add the other referenced plans, pertinent portions of Title 40 of the Code of Federal Regulations and Title 30 of the Texas Administrative Code, SW-846 Test Methods, and the TCEQ QAPP.

Lastly, the inclusion of the referenced documents as attachments was appreciated and helped with the review of the complete proposed plan of action.

Thanks,

Nicole

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**From:** Helen Dubach <[hdubach@ctehrm.com](mailto:hdubach@ctehrm.com)>

**Sent:** Wednesday, April 10, 2019 2:23 PM

**To:** spill12 <[spill12@tceq.texas.gov](mailto:spill12@tceq.texas.gov)>; Adams, Adam <[Adams.Adam@epa.gov](mailto:Adams.Adam@epa.gov)>; [johnathan.martin@pcs.hctx.net](mailto:johnathan.martin@pcs.hctx.net)

**Subject:** 2nd 80s Fire

Please see attached the revised Equipment Decon Plan. I will be printing today and circulating for approval. Note the following edits based on EPA and TCEQ comments:

EPA comment:

- The decon personnel might require a PPE level higher than Level D depending on the results of the air monitoring. **Added: If decon activities result in detections of VOCs above actionable levels, additional PPE requirements will be implemented as necessary (e.g. respiratory protection).**

TCEQ comment:

- how the cleaning area is drained/captured for removal. **The plan confirms that “All decon operations will take place in Decon pools, which will be set up on either side of an open roadway such that trucks and trailers can safely enter and exit without turning around and without interrupting work operations or endangering personnel. The pools will be set up on clean, flat ground on layers of visqueen and industrial carpet or 40 mil HDPE matting. Each decon pool will be constructed with a wide swath of visqueen around it to allow for splash potential and will be bordered by curbing that includes sorbent boom in order to prevent effluent from the pools from escaping containment and contaminating the ground. “ Added:**

Lined decon areas will be monitored for splash over liquids or rainwater, and significant accumulations will be pumped into vac trucks. During heavy rain, the decon pools and lined areas may be covered with poly liner to large volumes of rainwater ingress.

- clarification/verification on how the cleaning compound is/remains viable for cleaning (e.g., if dipping) or is it a one-time use per vehicle/vessel (is the material recirculated or a one-time use)? The decon operations are based on spraying rather than dipping. This is detailed in Section 7 of the plan
- reference is made to the yet developed waste management plan: when will the plan be provided for review and will it contain specific information on the capture, volume, transportation, storage (separate accumulation/storage/etc.) for the wastes generated from the decon activity? The Waste Management Plan is currently under internal review.
- the decon area is identified as being at another entity's location (Enterprise), please include the site verification information for pre and post use – how the no-impact demonstration is to be verified/conducted. Added the decon site sampling plan as an attachment.

Cheers,

**Helen Dubach**

Senior Consultant and Manager, Readiness

CTEH RM

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